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conveyed unto Hazel V. Russell according to Plaintiffs' Exhibit which is not numbered or lettered on your Respondents' copy of the Bill of Complaint but which is a deed from the Board of Education of Frederick County unto James Frenkil and Benjamin D. Palmer, and which deed specifically states that the property had been conveyed to Hazel V. Russell from the Board of Education of Frederick County by deed dated January 14, 1963 and recorded in Liber No. 679, folio 201, but that your Respondents, due to said deed reference (i.e. the reference to the deed to Hazel V. Russell), deny that the Board or its predecessor in title held title to the lots continuously from 1839 until 1968, when these lots were conveyed by the Board to the immediate predecessors in title of the Armstrongs, because the said exhibit refers to a deed from Charlotte W. Yarroll, Treasurer of Frederick County, Maryland conveying said real estate unto James Frenkil and Benjamin D. Palmer after the conveyance to Hazel V. Russell, and further that the Plaintiffs exhibit (again not numbered or lettered) which appears to be a deed from James Frenkil and Benjamin D. Palmer appears to be the deed under which the said Armstrongs attained title to said Lots which would make the said James Frenkil and Benjamin D. Palmer the immediate predecessors in title of the Armstrongs; However, your Respondents can neither admit nor deny the actual truth of these matters since they are not experts in title to real estate and have not had a title search made of said real estate in order to determine the actual truth or falsity of the allegations, relying only on the Plaintiffs exhibits, which also appear to show that Christian Harding, who conveyed the lots to the said Primary School District No. 62 only had a right to receive the ground rent in Lots 83 and 84 and a reversionary interest in said lots if said ground rent were not paid, so that your Respondents do not know whether or not the said Christian Harding acquired title to Lots 84 and 85 in any other manner and do not know the status of Lot 83.

(1) That in further answer to said Paragraph 9 (g) of said Bill of Complaint, your Respondents admit that it is their understanding that a school building was built on said lots prior to 1939, and that in 1939, based on the heretofore referred to minutes of meetings of the Board, your Respondents